



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

OCT 27 1987

REPLY TO
ATTN OF

HW-112

Thomas F. Gesell, Deputy Assistant
Manager for Nuclear Programs
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

C. E. Clark, Environmental Scientist
Operational Safety Division
U.S. Department of Energy
Idaho Operations Office
785 DOE Place
Idaho Falls, Idaho 83402

Re: INEL Closure Plan Reviews for TAN-726, Ion Exchange Treatment Unit,
TAN-674 Tank, IET Container Storage Unit, and Hg Contaminated Area -
CPP-55

Dear Sirs:

We have had one of our consultants review the partial closure plans submitted by INEL for the TAN-726 Tank Storage, TAN 674 LOFT Shield Tank Storage, Ion Exchange Treatment Unit, IET Container Storage Unit, and Mercury Contaminated Area CPP-55. These plans are for storage and treatment units and therefore, are not submitted pursuant to the Consent Order and Compliance Agreement. We have enclosed a copy of the narrative summary for your review which are somewhat self explanatory. In general there are numerous deficiencies in each of the plans submitted. Our regulatory concerns are primarily that the plans do not contain a schedule for completion of work and provide so little detail as to not allow for an evaluation. Even though the work described in these plans have been mostly completed, the closure plan must be approved and closure conducted in accordance with the approved closure plan prior to the closure being certified. As currently drafted, the plans require revision before they can be approved by EPA. For each case where clean closure is being demonstrated, sampling of the soils or structures underlying the storage or treatment unit must be conducted. For units which are not being removed, a static test may be performed to document that the tank has not leaked. If radionuclides can be used as an indicator to confirm no leaks or spills, then this data should be provided along with the methodology followed. At a minimum, each closure plan should meet the minimum regulatory requirements even if it is believed unnecessary or posthumous.

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ASST. DIR. FOR NUCLEAR PROGRAMS
FOR NUCLEAR PROGRAMS

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Please contact Wayne Pierre at (206) 442-7261 of my staff if you require further discussion on this matter. Otherwise, we will expect to receive your revised closure plans for these units at your earliest convenience.

Sincerely,



Kenneth D. Feigner, Chief
Waste Management Branch

Enclosure

cc: Cheryl Koshuta, IDHW